

## UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

United States of America

v.

JATINDER SINGH

*Defendant(s)*

Case No.

1:19-mj-1061

**SEALED****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 20, 2019 in the county of Marion in the  
Southern District of Indiana, the defendant(s) violated:

*Code Section**Offense Description*

Count 1: Title 21, United States  
 Code, Sections 841(a)(1), (b)(1)(C)

Possession with Intent to Distribute Poppy Straw and Morphine

Count 2: Title 21, United States  
 Code, Sections 960(a)(1), (b)(3)

Unlawful Importation of Poppy Straw

This criminal complaint is based on these facts:

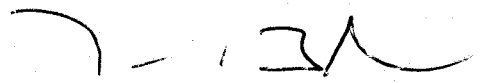
See attached affidavit.

☒ Continued on the attached sheet.*Complainant's signature*

Derek Root, DEA Task Force Officer

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 11/20/2019*Judge's signature*City and state: Indianapolis, Indiana

Tim A. Baker, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Derek A. Root, a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA), in Indianapolis, Indiana, being duly sworn, state as follows:

**INTRODUCTION**

1. I, Derek A. Root, am a Task Force Officer for the Drug Enforcement Administration (DEA), Tactical Diversion Squad (TDS), assigned to the Southern District of Indiana for the United States Department of Justice (DOJ). I have been a Police Officer for the Kokomo Police Department (KPD) since 2009 and a Task Force Officer with the DEA since 2016. As part of my DEA duties, I am responsible for investigating criminal violations such as conspiracy to distribute and to possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Sections 846 and 841(a) (1) and the laundering and concealing of proceeds from drug trafficking in violation of Title 18, United States Code, Sections 1956 and 1957.
2. The information contained in this affidavit is based on my knowledge and observations made by me during the course of this investigation, on information conveyed to me by other law enforcement officers, and on my examination and review of physical evidence obtained during the investigation. I have consulted with other members of the investigative team who have extensive knowledge and experience with regard to the trafficking of controlled substances.
3. This affidavit is being submitted in support of a request for the issuance of a criminal complaint and arrest warrant for Jatinder SINGH for the offenses of Possession with the Intent to Distribute Poppy Straw and Morphine, Schedule II controlled substances, in violation of

Title 21, United States Code, Section 841(a)(1), and the Unlawful Importation of Poppy Straw in violation of Title 21, United States Code, Sections 952, 957, and 960(a)(1). Since this affidavit is being submitted for the limited purpose of securing an arrest warrant and complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for the proposed arrest warrant and complaint.

**FACTS AND CIRCUMSTANCES SUPPORTING PROBABLE CAUSE**

4. In or around April 2019, DEA, in conjunction with the United States Postal Inspection Service (USPIS), the Indianapolis Metropolitan Police Department (IMPD), and Homeland Security Investigations (HSI), initiated an investigation into the illegal possession and distribution of poppy straw, a Schedule II controlled substance containing morphine.<sup>1</sup> During the course of this investigation, it was learned that individuals were distributing ground dried poppy straw to semi-truck drivers in the Indianapolis area. It is believed that the drivers then use the dried poppy straw to brew a tea containing morphine. One of the targets of the investigation is Jatinder SINGH, a resident of Indianapolis.

5. Traffic Stop of SINGH and SINGH's Wife. On August 20, 2019, IMPD conducted a traffic stop of a vehicle occupied by SINGH and his wife, Tasha Walker-Singh. Walker-Singh agreed to speak with law enforcement officers. (SINGH was released from the scene.) During a recorded interview, Walker-Singh identified 2401 S. Meridian Street, Indianapolis, Indiana ("Meridian Street"), as her residence and provided verbal and written

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<sup>1</sup> Opium poppy and poppy straw are Schedule II controlled substances. 21 U.S.C. § 812, Schedule II(a)(3). Morphine is a Schedule II controlled substance. 21 U.S.C. § 812, Schedule II(a)(1).

consent to a search of the residence for contraband. (Walker-Singh was arrested on an outstanding State of Indiana arrest warrant.)

6. Consent Search of Meridian Street Residence. Later that same day, investigators approached Meridian Street (a single-family residence in the Southern District of Indiana) and knocked on the front door. Two individuals were present inside the home: SINGH and his brother-in-law, Jeffrey Walker. SINGH consented to a search of the residence, although he stated that he did not live there. During the search of Meridian Street, investigators found multiple items of significance to the investigation, including:

- a) A men's style, trifold wallet (upstairs east bedroom) containing notations of Return TRK# 775868073012, and September 5, 2019;
- b) A cell phone ("Target Phone 1") (upstairs east bedroom);
- c) Drug paraphernalia (upstairs east bedroom), including digital scales with residue, and a metal grinder with green remains;
- d) Miscellaneous paperwork (upstairs east bedroom), including:
  - (1) an Indiana driver's license for Walker-Singh;
  - (2) an Indianapolis Power & Light (IPL) bill addressed to Tasha and Jatinder SINGH at Meridian Street, dated July 10, 2019;
  - (3) bail related paperwork for Tasha Singh, dated February 4, 2019;
  - (4) a Fifth Third Bank paper document addressed to "Ghuman Inc." at 2017 Lambert Street, Indianapolis, Indiana;
- e) One unopened, FedEx box (first floor) addressed to JJ Walker. The box displayed the following information:
  - (1) Destination address: Meridian Street with telephone number (765) 609-9129;
  - (2) Return address: Curtis Gaare Michael, Old World trading Company, 2 Coombe Meadow Westfield Rise Saltdean, SS BN28PQ, United Kingdom GB;
  - (3) Tracking number: 7760 1366 1734 (XH GSHA);



FedEx box label

- f) One opened FedEx box (first floor) addressed to JS SINGH. The box displayed the following information:
  - (1) Destination address: 2017 W Lambert Street, with telephone number (765)-609-9129;
  - (2) Return address: Curtis Gaare Michael, Old World trading Company, 2 Coombe Meadow Westfield Rise Saltdean, SS BN28PQ, United Kingdom GB;

g) One bag of suspected poppy powder located inside a white chair (first floor);

h) One note pad (first floor) with handwritten notes, including "Poppy Pods."

7. FedEx Parcel Discovered to Contain Poppy Straw. Walker consented to officers

opening the FedEx package that was addressed to "JJ Walker" and shipped from the U.K.

Investigators opened the box and found a plastic bag containing approximately 2.424 kilograms of suspected dried, poppy straw. This suspected poppy straw was later submitted to the DEA lab

for analysis. The results of that analysis showed that the poppy straw contained approximately 2.424 kilograms of morphine.

8. Interview of Walker. Walker agreed to speak with law enforcement. During a recorded interview, Walker stated the following:

- a) He had lived at Meridian Street for approximately one month.
- b) The unopened FedEx package with his name on it was actually for SINGH.
- c) SINGH has packages that come to this address in multiple names, including his own (i.e., Walker).
- d) When the packages arrive, he sets them aside and gives them to SINGH.
- e) He denied knowing what the package contained.
- f) SINGH grinds up the material and sells it to people at the truck stops at I-465 and Harding Street (Pilot and Mr. Fuel) in Indianapolis, Indiana.
- g) SINGH's customers call him, and he (SINGH) delivers the product to them.
- h) He denied being involved in any distribution, with the exception of accepting the packages.
- i) He does not receive money for accepting the packages.
- j) SINGH had a credit card with Jeffrey Walker's name on it, that SINGH uses in furtherance of criminal activity.
- k) He believes SINGH takes boxes to 2011 W. Lambert Street to process/grind the product.

l) He indicated that SINGH does all his business over his cell phone, not via computer.

9. Interview of SINGH. SINGH also agreed to speak with law enforcement. During a recorded interview, SINGH provided the following information:

a) He identified the upstairs, east bedroom as belonging to him and his wife. He identified Target Phone 1 and the wallet located on the bed in the upstairs, east bedroom as belonging to him.

b) With regards to his residence, SINGH stated that he paid rent and lived at Meridian Street. He later stated he lived at 3205 S. Keystone Avenue, Indianapolis, Indiana ("Keystone Avenue"), which was owned by his uncle, Bin Singh.

c) When asked directly about the FedEx box, SINGH stated, "It's not my name." He further stated that he did not check the mail at Meridian Street.

d) He knew of a previous package that had been sent to Meridian Street at least one week prior, but an unknown person took the box. He stated it was his friend's box, and he described his friend as Gaddi Singh.

e) He stated he did meet truck drivers at truck stops, but denied giving them anything, only stating they would sometimes give him grapes.

10. Consent Search of Keystone Avenue. TFO Root made contact with Bin Singh, the owner of Keystone Avenue. Bin Singh gave consent for agents to search the address for illegal contraband and provided investigators with a key to the residence. DEA performed a consent search on the same date, August 20, 2019, and found the following items at the address:

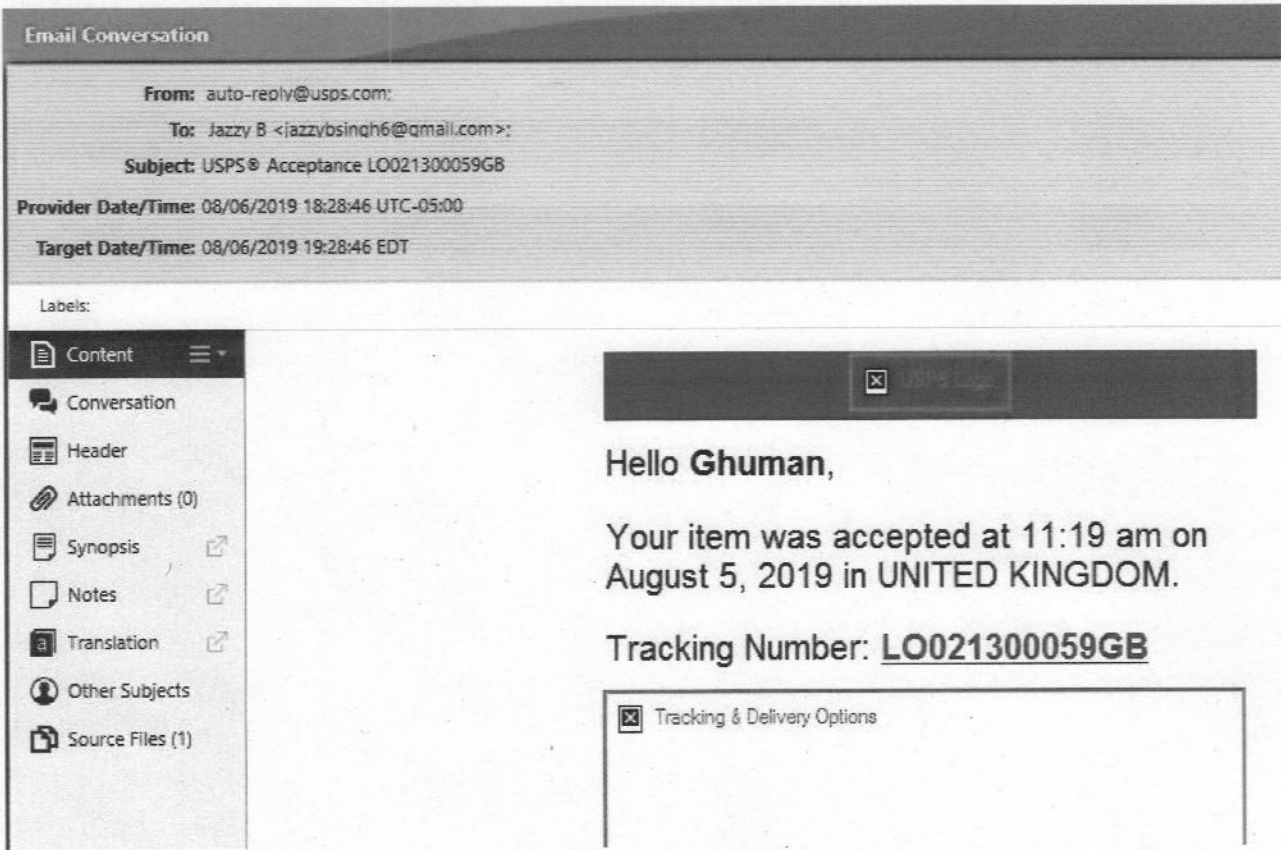
a) One commercial-sized blender with poppy pod residue (bottom kitchen cabinet and under the sink);



- b) One yellow and red bowl, that contained poppy pod residue (top right kitchen cabinets);
- c) Poppy bulb (on top of the kitchen cabinets);
- d) One opened package addressed to Ghuman Singh. The box displayed the following information:
  - (1) Destination address: Meridian Street, with telephone number (765)-609-9129;
  - (2) Return address: PO Box No. 7161, Domestic Airport Post Office, 1301 Pasay City, Philippines;
  - (3) Tracking number: "PHLPOST" Tracking number TYPH0018630962;
- e) Package label (inside garbage can inside kitchen) displaying the following information:
  - (1) Destination address: J.S Singh at Meridian Street, with telephone number (765) 609-9129;
  - (2) Return address: Curtis Gaare Michael, Old World trading Company, 2 Coombe Meadow Westfield Rise Saltdean, SS BN28PQ, United Kingdom GB;
- f) IPL bill addressed to Tasha and Jatinder SINGH at Meridian Street.

11. Search of Target Phone 1. On August 23, 2019, a search warrant was obtained and executed on Target Phone 1, which was assigned telephone number (765) 609-9129 and had been previously identified by SINGH as his telephone. A review of the telephone's contents revealed multiple email communications pertaining to USPS shipments and tracking numbers for packages sent between in or around December 2018 and August 2019. The email addresses associated with Target Phone 1 and these communications were jazzybsingh6@gmail.com and baazbaaz1313@gmail.com. Several excerpts of these communications are displayed below (investigative commentary is noted in red):





Email A: Sent to [jazzybsingh6@gmail.com](mailto:jazzybsingh6@gmail.com) on or about August 6, 2019

Email Conversation

**From:** North Quadrant Marketplace <nq-reply@nqmarketplace.com>  
**To:** Jazzv B <baazbaaz1313@gmail.com>  
**Subject:** North Quadrant Marketplace: Order Shipped #85754902

**Provider Date/Time:** 07/10/2019 09:55:58 UTC+00:00  
**Target Date/Time:** 07/10/2019 05:55:58 EDT

Labels:

**Content**

- Conversation
- Header
- Attachments (0)
- Synopsis
- Notes
- Translation
- Other Subjects
- Source Files (1)

**Order Shipped: #85754902**

Your order from North Quadrant Marketplace has shipped.

Order Number: **#85754902** (placed on July 8, 2019 10:18PM BST)

UK VAT Registration Number: 284 2745 80

**Delivery**

Shipped via FedEx Tracking Number: 779673506310

**BILLED TO:**  
 J/s Singh  
 3362 West Mooresville Road  
 Indianapolis, IN 46221  
 United States  
 CC: XXXX-3529  
 baazbaaz1313@gmail.com  
 7656099129

**SHIPPING TO:**  
 J/s Singh  
 3362 West Mooresville Road  
 Indianapolis, IN 46221  
 United States  
 7656099129  
 Free Tracked Shipping Special

**Order Summary**

ITEM	QTY	UNIT PRICE	SUBTOTAL
Dried Poppy Pods - 2.5 kg drfp055 2.5 kg / 5.5 lb - only \$465	1	\$465.00	\$465.00
Item Subtotal			\$465.00
Shipping & Handling			\$0.00
Net Total			\$465.00
Tax			\$0.00
<b>TOTAL</b>			<b>\$465.00</b>

**Additional Information**

Note / Additional Info:  
 Old World Trading Company Limited • 284 2745 80 • Old Shoreham Road, Hove, England, BN3 7GS, United Kingdom

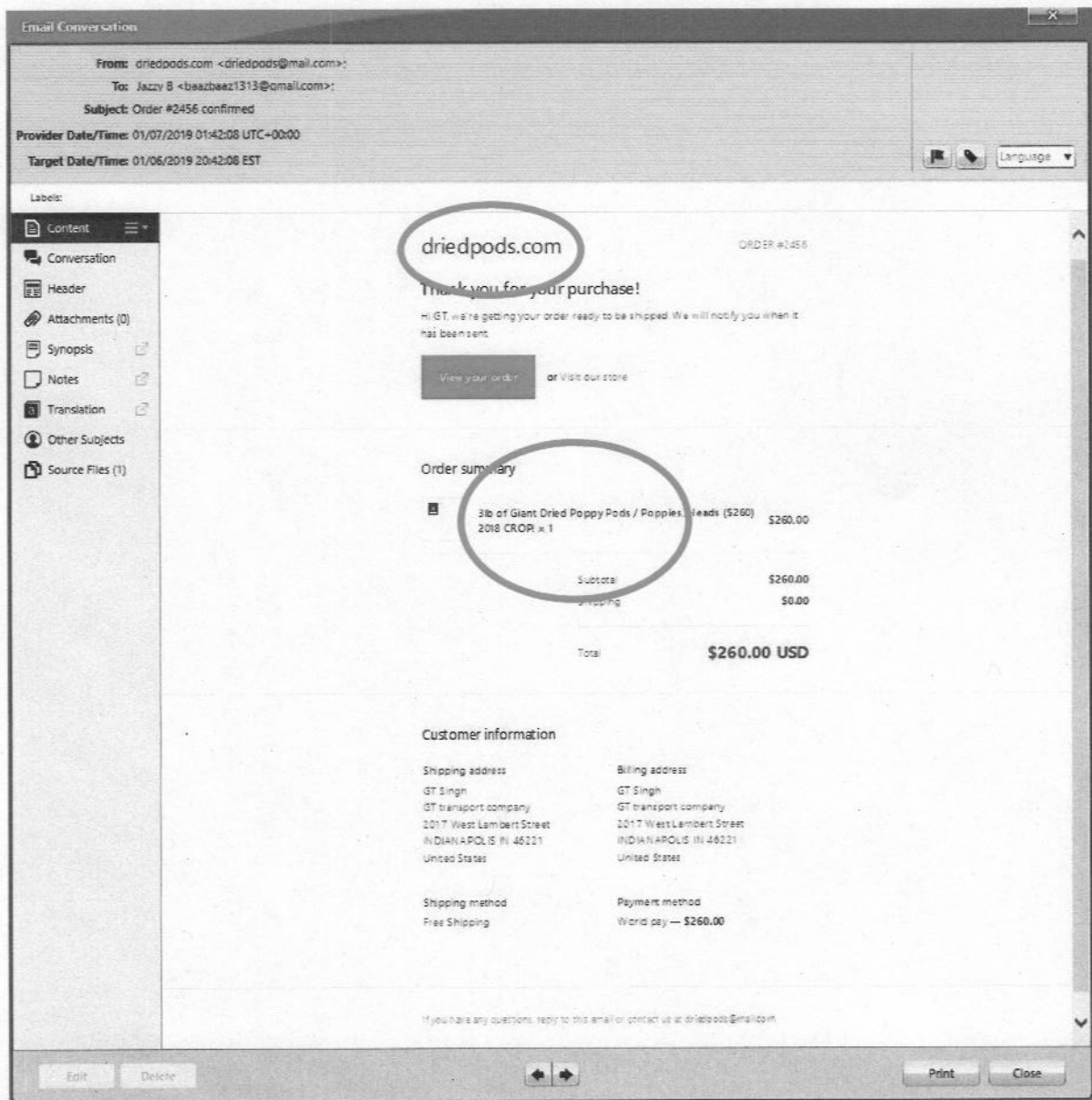
Company linked to poppy pods (*see infra*)

Recipient name on discarded label from Keystone Avenue

Sender name on discarded label from Keystone Avenue

Email B: Sent to [baazbaaz1313@gmail.com](mailto:baazbaaz1313@gmail.com) on or about July 10, 2019





Email C: Sent to [baazbaaz1313@gmail.com](mailto:baazbaaz1313@gmail.com) on or about January 7, 2019

12. TFO Chandler conducted an open source internet search and found the main page of Northwest Quadrant Marketplace ([www.nqmarkteplace.com](http://www.nqmarkteplace.com)) which states, "We pride ourselves on being able to deliver the highest quality, very best dried poppy pods available."

13. Email Search Warrant. On September 20, 2019, agents obtained a search warrant for content associated with the above-listed Google email accounts. On or about October 29, 2019, investigators received responsive information which included subscriber information for the email accounts, email content, stored digital media, chat communications, and other items.

14. With regard to email address [baazbaaz1313@gmail.com](mailto:baazbaaz1313@gmail.com), the listed subscriber is Baaz Singh, with an account creation date of on or about August 16, 2018. On August 16, 2018, an email was sent from this account to an "Indy.Gov" email address (full address known to me but redacted herein) stating, "Hello sir my name jatinder Singh, my gallery number is 793612..." Further emails to the same Indy.Gov email address, including one sent September 4, 2018, included in the subject line, "Re: jatinder Singh, [XX],[XX],1987." Investigators learned that the Indy.Gov email address is an email address associated with an employee of Marion County Indiana Community Corrections. A search of Marion County Indiana jail records indicated that SINGH's permanent ID is 793612.

15. A review of the subscriber information for [jazzbsingh6@gmail.com](mailto:jazzbsingh6@gmail.com) revealed the subscriber to be "Jazzy B." Additional information indicated on the registration includes a recovery email address of [baazbaaz1313@gmail.com](mailto:baazbaaz1313@gmail.com) and SMS: +17656099129 (i.e., the telephone number for Target Phone 1).

16. A review of email content sent or received from [jazzbsingh6@gmail.com](mailto:jazzbsingh6@gmail.com) and [baazbaaz1313@gmail.com](mailto:baazbaaz1313@gmail.com) revealed records relating to orders shipped from Northwest Quadrant

Market Place. For example, on August 19, 2019, [Jazzybsingh6@gmail.com](mailto:Jazzybsingh6@gmail.com) received an email from [no-reply@nqmarketplace.com](mailto:no-reply@nqmarketplace.com) indicating that order number 85755388 placed on August 17, 2019, had shipped via FedEx tracking number 776013661734. The order was shipped to JJ Walker, 2401 South Meridian Street, Indianapolis, Indiana 46225, United States, 7656099129. The order summary included "Dried Poppy Pods – 2.5kg" quantity 1, unit price \$465.00. The address listed on the order was Old World Trading Company Limited, 284 2745 80, Old Shoreham Road, Hove, England, BN3 7GS, United Kingdom.

Email Conversation

From: North Quadrant Marketplace <[no-reply@nqmarketplace.com](mailto:no-reply@nqmarketplace.com)>  
 To: Jazzy B <[jazzybsingh6@gmail.com](mailto:jazzybsingh6@gmail.com)>  
 Subject: North Quadrant Marketplace Order Shipped #85755388  
 Provider Date/Time: 08/19/2019 10:11:46 UTC-00:00  
 Target Date/Time: 08/19/2019 06:11:46 EDT

Labels:

Content

Conversation

Header

Attachments (0)

Synopsis

Notes

Translation

Other Subjects

Source Files (1)

**Order Shipped: #85755388**

Your order from North Quadrant Marketplace has shipped.

Order Number: #85755388 (placed on August 17, 2019 07:42AM BST)

UK VAT Registration Number: 284 2745 80

**Delivery**

Shipped via FedEx Tracking Number: [776013661734](#)

<b>BILLED TO:</b>	<b>SHIPPING TO:</b>
JJ Walker	JJ Walker
2401 South Meridian Street	2401 South Meridian Street
Indianapolis, IN 46225	Indianapolis, IN 46225
United States	United States
CC: XXXX-3529	7656099129
<a href="mailto:jazzybsingh6@gmail.com">jazzybsingh6@gmail.com</a>	Free Tracked Shipping Special
7656099129	

**Order Summary**

ITEM	QTY	UNIT PRICE	SUBTOTAL
Dried Poppy Pods - 2.5 kg or 5.5 lb	1	\$465.00	\$465.00
2.5 kg / 5.5 lb - only \$465			
<b>Item Subtotal</b>			\$465.00
<b>Shipping &amp; Handling</b>			\$0.00
<b>Tax Total</b>			\$465.00
<b>Tax</b>			\$0.00
<b>TOTAL</b>			\$465.00

**Additional Information**

Note / Additional Info:

Old World Trading Company Limited • 284 2745 80 • Old Shoreham Road, Hove, England, BN3 7GS, United Kingdom

This package was recovered by law enforcement during the search of Meridian Street.

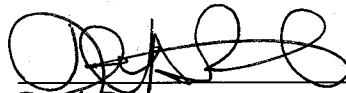
The telephone number listed on the order is that assigned to Target Phone 1.

17. In addition to the shipment described above, from January 31, 2019, through August 12, 2019, emails received by these two accounts from no-reply@nqmarketplace.com, indicated that SINGH, through a variety of identifications and at multiple addresses, received approximately 45 separate shipments from Northwest Quadrant Marketplace, all indicating "Dried Poppy Pods – 2.5kg" quantity 1, unit price \$465.00 with the return address of the order as Old World Trading Company Limited, 284 2745 80, Old Shoreham Road, Hove, England, BN3 7GS, United Kingdom. These shipments totaled approximately 112.5 kilograms of poppy straw being sent from Northwest Quadrant Marketplace to SINGH.

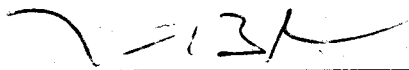
18. A review of DEA registrations issued for the purpose of importing a controlled substance into the United States revealed no registration in the name of SINGH or any related company in the State of Indiana.

### CONCLUSION

19. Based upon the above, I respectfully submit that probable cause exists to believe that Jatinder SINGH violated 21 U.S.C. § 841(a)(1) (Possession with Intent to Distribute Poppy Straw and/or Morphine) and 21 U.S.C. § 960(a)(1) (Illegal Importation of Poppy Straw).

  
Derek Root  
Drug Enforcement Administration

Sworn to and subscribed to before me this 20th day of November 2019.

  
The Honorable Tim A. Baker  
U.S. Magistrate Judge  
Southern District of Indiana